

March 31, 2020

Via ECF

Hon. Eric N. Vitaliano, U.S.D.J.
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Anacacy v. Panera, LLC, et. al.*, Case No. 2:19-cv-07126-ENV-RLM
Proposed Briefing Schedule for Defendants' Motion to Dismiss

Dear Judge Vitaliano:

As the Court is aware, this law firm represents the Defendants in the above-captioned matter. Pursuant to the Court's docket order dated March 17, 2020, the Defendants were granted leave to file their Motion to Dismiss Plaintiff's Complaint, and the parties were ordered to submit a joint briefing schedule for the motion. The proposed briefing schedule outlined below is submitted for the Court's consideration with the consent of Plaintiff's counsel:

Event	Date
Defendants Shall Serve Their Initial Motion Papers	April 17, 2020
Plaintiff Shall Serve His Response Brief	May 8, 2020
Defendants Shall Serve Their Reply Brief	May 20, 2020
Defendants Shall File All Motion Papers via ECF	May 22, 2020

The parties understand that this motion is subject to the bundling rule set forth in Rule III.D. of the Court's Individual Practices. In consideration of this, and the guidance promulgated by the federal and state governments to combat the spread of the COVID-19 virus (which has limited counsel's access to support staff and supplies), the parties agree that they shall serve all

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motion papers on opposing counsel via e-mail only, as PDF documents in OCR-readable format, to the e-mail addresses registered to receive service on the CM/ECF system. Service shall be made before 11:59PM on the dates set forth above. Defendants shall be responsible for filing all motion papers (including those served by Plaintiff) via ECF on or before May 22, 2020. Defendants shall further be responsible for submitting a courtesy copy of all motion papers to the Court via Federal Express (or a reasonable alternative) on or before May 22, 2020. Counsel shall not appear for oral argument unless specifically ordered by the Court.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Erik P. Pramschufer
Erik P. Pramschufer

cc: All counsel (via ECF)